

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

OCADO INNOVATION LTD. and	)	Case No. 1:21-cv-00041-JL
OCADO SOLUTIONS LTD.,	)	
	)	
Plaintiffs,	)	<b>Hon. Joseph N. Laplante</b>
v.	)	
	)	
AUTOSTORE AS and	)	
AUTOSTORE SYSTEM INC.,	)	
	)	
	)	
Defendants.	)	
	)	

**OCADO’S ASSENTED-TO MOTION TO SEAL PROPOSED SUPPLEMENTAL  
RESPONSES TO CERTAIN OF THE COURT’S *MARKMAN* HEARING QUESTIONS**

Plaintiffs Ocado Innovation Ltd. And Ocado Solutions Ltd. (together, “Ocado”), by and through their undersigned counsel and pursuant to LR 83.12(c), move this Court to seal its Proposed Supplemental Responses to Certain of the Court’s *Markman* Hearing Questions (the “Responses”). The Responses were filed publicly in redacted form at Docket Number 140-1. A memorandum is unnecessary for this motion because the motion raises a procedural question only and the relief requested herein is within the sound discretion of the Court. Pursuant to LR 7.1(c), Ocado has obtained the concurrence of Defendants AutoStore AS and AutoStore System Inc.

The unredacted Responses contain information that Defendants have designated as “confidential business information” and therefore must be filed under seal pursuant to the Stipulated Protective Order entered by the Court (Dkt. No. 90 ¶ 6). Ocado requests that the Responses be sealed, in their entirety, at Level I, until further order of the Court. (*See id.* ¶ 17.) Ocado does not seek to seal this motion to seal or related docket text entries.

Date: October 12, 2022

Respectfully submitted,

/s/ Henry C. Quillen

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*Counsel for Plaintiffs Ocado Innovation Ltd.  
and Ocado Solutions Ltd.*

### **CERTIFICATE OF SERVICE**

I, Henry C. Quillen, certify pursuant to LR 5.1(d) that I served the foregoing document via email on Defendants' counsel of record on today's date.

Dated: October 12, 2022

/s/ Henry C. Quillen  
Henry C. Quillen